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Specially Appearing Attorney for
Defendant CURTISS EDWARD JACKSON

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII**

Securities and Exchange Commission,

Plaintiff,

vs.

Semisub, Inc., Curtiss Edward Jackson, and
Jamey Denise Jackson,

Defendants.

CV 22-00349-SOM-KJM

**MOTION FOR STAY OF
PROCEEDINGS AGAINST
DEFENDANTS SEMISUB, INC. AND
CURTISS EDWARD JACKSON;
MEMORANDUM IN SUPPORT OF
MOTION; DECLARATION OF
COUNSEL; CERTIFICATE OF
SERVICE**

**MOTION FOR STAY OF PROCEEDINGS AGAINST
DEFENDANTS SEMISUB, INC. AND CURTISS EDWARD JACKSON**

COMES NOW Defendant CURTISS EDWARD JACKSON (“C Jackson”)
and hereby requests a stay of these proceeding against him and Defendant
SEMISUB, INC. (“Semisub”) until the conclusion of the pending criminal matter
entitled *United States of America vs. Curtiss E. Jackson and Jamey Denise
Jackson*; Cr. No. 22-00093 JMS (“Criminal Case”). Virtually all the facts,

defenses, and legal arguments to be made in the Criminal Case, apply equally to this civil proceeding. Therefore, to protect C. Jackson's constitutional rights, including but not limited to, his Fifth Amendment Privilege Against Self-Incrimination, and for judicial economy, the Criminal Case should be adjudicated first.

This Motion is made pursuant to Rule 7(b) of the *Federal Rules of Civil Procedure*, and supported by the Memorandum of Law In Support Of Motion and Declaration of Counsel, both attached hereto and made parts hereof, the records and files herein, and the arguments of Counsel at the hearing thereon.

Dated at Honolulu, Hawaii November 1, 2022.

---/s/ Harlan Y. Kimura-----
Harlan Y. Kimura
Specially Appearing Attorney for Defendant
CURTISS EDWARD JACKSON